

[*Parties and Counsel Listed on Signature Pages*]

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

IN RE: SOCIAL MEDIA ADOLESCENT
ADDICTION/PERSONAL INJURY
PRODUCTS LIABILITY LITIGATION

THIS DOCUMENT RELATES TO:

People of the State of California, et al. v. Meta Platforms, Inc., et al.

MDL No. 3047

Case Nos. 4:22-md-03047-YGR-PHK

4:23-cv-05448-YGR

META AND STATE AGS' STIPULATION AND ~~PROPOSED~~ ORDER EXTENDING CERTAIN EXPERT DEADLINES

Judge: Hon. Yvonne Gonzalez Rogers

Magistrate Judge: Hon. Peter H. Kang

Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12, the State Attorneys General (“State AGs”) and Defendants Meta Platforms, Inc.; Instagram, LLC; Meta Payments, Inc.; and Meta Platforms Technologies, LLC (collectively, “Meta,” and together, the “Parties”), through their undersigned counsel, hereby stipulate as follows:

1. Under the current case schedule, the deadline for the State AGs to submit certain expert reports, including the reports of Patrick McDaniel and Carl Saba, is August 1, 2025; for Meta to submit responsive expert reports is September 26, 2025 or eight weeks after opening reports; and for the State AGs to submit rebuttal reports is October 24, 2025 or four weeks after responsive reports. *See ECF 1955, at 4–5.*

2. The Parties have met and conferred over several weeks and have agreed, subject to Court approval, to extend the deadline for the McDaniel and Saba opening expert reports by approximately six weeks to September 12, 2025.

3. Certain discovery that the State AGs intend to incorporate into the McDaniel and Saba reports has not yet been produced. Meta estimates that it can produce this discovery according to the following schedule:

- a. Additional supplemental production of underage user reporting and enforcement data responsive to Request for Production No. 102 and PI/SD Request for Production No. 124 using different geographic filters, if any: on or around August 1, 2025.
- b. Daily time spent data for Facebook: by July 25, 2025.
- c. Supplemental response to Interrogatory No. 32: on or around July 25, 2025.
- d. Soft-matching data and corresponding underage user reporting and enforcement data: on a rolling basis, with production complete on or around August 15, 2025.

4. The Parties also agree, subject to Court approval, to extend the deadlines by approximately three to four weeks for (a) Meta’s reports responsive to these two State AG expert reports; (b) the rebuttal reports corresponding to these two expert reports; and (c) the close of expert discovery as related to these two reports and any related responsive and rebuttal reports, as reflected in the chart below.

1 5. The Parties also agree, subject to Court approval, that, in order for the State AGs to
2 incorporate the soft-matching data described above in paragraph 3(d) into the McDaniel report, the State
3 AGs will serve a supplemental expert report of Patrick McDaniel regarding this data on September 19,
4 2025.

5 6. This Court has previously extended expert report deadlines generally, on agreement of all
6 parties to the MDL as part of an MDL-wide schedule extension, *see* ECF 1159, and again as to four State
7 AG-specific experts—including the two that are the subject of this extension—on agreement of the State
8 AGs and Meta, *see* ECF 1955.

9 7. The changes in these deadlines will not affect other deadlines in the case schedule. In
10 particular, existing deadlines regarding Rule 702 motions and dispositive motions will remain the same.
11 *See* ECF No. 1290; ECF No. 1955.

12 8. To the extent that Meta does not complete production of the discovery listed in paragraph
13 3 within the timeframe referenced in that paragraph, or produces incomplete or incorrect data, the Parties
14 agree to promptly meet and confer regarding further adjustments to the expert discovery schedule,
15 including the possible reduction of time within which Meta will have to serve responsive reports to the
16 McDaniel and Saba opening expert reports.

17 9. The Parties reserve all other rights related to the data listed in paragraph 3 and all other
18 productions of structured data that Meta has made or may make in this action, including as to any
19 incomplete or inaccurate productions.

20 10. Therefore, the Parties agree, subject to the Court's approval, that the following deadlines
21 will apply:

Event	Current Deadline	Proposed Deadline
Non-Case Specific and Causation Experts: Plaintiffs' Opening Reports	August 1, 2025 (for the State AGs' four AG-specific expert reports)	September 12, 2025 (for the opening reports of Patrick McDaniel and Carl Saba)
Supplemental Opening Expert Report of Patrick McDaniel	<i>No Current Deadline</i>	September 19, 2025
Non-Case Specific and Causation Experts: Defendants' Responsive Reports	September 26, 2025 (for Meta's responsive reports to the State AGs' four AG-specific expert reports), or approximately 8 weeks after Opening Reports, whichever is sooner	October 24, 2025 (for Meta's responsive reports to the McDaniel and Saba reports)
Non-Case Specific and Causation Experts: Plaintiffs' Rebuttal Reports	October 24, 2025 (for the State AGs' rebuttal reports in response to Meta's responsive reports to the State AGs' four AG-specific expert reports), or 4 weeks after Responsive Reports, whichever is sooner	November 14, 2025 (for the State AGs' rebuttal reports in response to Meta's responsive reports to the McDaniel and Saba reports)
Close of Expert Discovery	November 7, 2025 (for depositions of the State AGs' four AG-specific experts, Meta's responsive experts, and any AG rebuttal experts), or approximately 2 weeks after Rebuttal Reports	December 5, 2025 (for depositions of Patrick McDaniel, Carl Saba, Meta's responsive experts, and any AG rebuttal experts)

IT IS SO STIPULATED AND AGREED.

Respectfully submitted,

DATED: July 24, 2025

By: /s/ Megan O'Neill

ROB BONTA
Attorney General
State of California

Nicklas A. Akers (CA SBN 211222)
Senior Assistant Attorney General
Bernard Eskandari (SBN 244395)
Emily Kalanithi (SBN 256972)
Supervising Deputy Attorneys General
Nayha Arora (CA SBN 350467)
Megan O'Neill (CA SBN 343535)
Joshua Olszewski-Jubelirer (CA SBN 336428)

1 Marissa Roy (CA SBN 318773)
2 Brendan Ruddy (CA SBN 297896)
3 Deputy Attorneys General
4 California Department of Justice
5 Office of the Attorney General
6 455 Golden Gate Ave., Suite 11000
7 San Francisco, CA 94102-7004
8 Phone: (415) 510-4400
9 Fax: (415) 703-5480
10 Megan.O'Neill@doj.ca.gov

11
12 *Attorneys for Plaintiff the People of the State of*
13 *California*

14
15 **PHILIP J. WEISER**
16 Attorney General
17 State of Colorado

18 /s/ Krista Batchelder

19
20 Krista Batchelder, CO Reg. No. 45066,
21 *pro hac vice*
22 Deputy Solicitor General
23 Shannon Stevenson, CO Reg. No. 35542, *pro hac vice*
24 Solicitor General
25 Elizabeth Orem, CO Reg. No. 58309, *pro hac vice*
26 Assistant Attorney General
27 Colorado Department of Law
28 Ralph L. Carr Judicial Center
Consumer Protection Section
1300 Broadway, 7th Floor
Denver, CO 80203
Phone: (720) 508-6651
krista.batchelder@coag.gov
Shannon.stevenson@coag.gov
Elizabeth.orem@coag.gov

1
2 *Attorneys for Plaintiff State of Colorado, ex rel.*
3 *Philip J. Weiser, Attorney General*

4
5 **RUSSELL COLEMAN**
6 Attorney General
7 Commonwealth of Kentucky

8 /s/ Philip Heleringer

1 J. Christian Lewis (KY Bar No. 87109),
 2 *Pro hac vice*
 3 Philip Heleringer (KY Bar No. 96748),
 4 *Pro hac vice*
 5 Zachary Richards (KY Bar No. 99209),
 6 *Pro hac vice*
 7 Daniel I. Keiser (KY Bar No. 100264),
 8 *Pro hac vice*
 9 Matthew Cocanougher (KY Bar No. 94292),
 10 *Pro hac vice*
 11 Assistant Attorneys General
 12 1024 Capital Center Drive, Suite 200
 13 Frankfort, KY 40601
 14 CHRISTIAN.LEWIS@KY.GOV
 15 PHILIP.HELERINGER@KY.GOV
 16 ZACH.RICHARDS@KY.GOV
 17 DANIEL.KEISER@KY.GOV
 18 MATTHEW.COCANOUGHER@KY.GOV
 19 Phone: (502) 696-5300
 20 Fax: (502) 564-2698

13 *Attorneys for Plaintiff the Commonwealth of Kentucky*

14 **MATTHEW J. PLATKIN**
 15 Attorney General
 16 State of New Jersey

17 /s/ Kashif T. Chand
 18 Kashif T. Chand (NJ Bar No. 016752008),
 19 *Pro hac vice*
 20 Section Chief, Deputy Attorney General
 21 Thomas Huynh (NJ Bar No. 200942017),
 22 *Pro hac vice*
 23 Assistant Section Chief, Deputy Attorney General
 24 Verna J. Pradaxay (NJ Bar No. 335822021),
 25 *Pro hac vice*
 26 Mandy K. Wang (NJ Bar No. 373452021),
 27 *Pro hac vice*
 28 Deputy Attorneys General
 New Jersey Office of the Attorney General,
 Division of Law
 124 Halsey Street, 5th Floor
 Newark, NJ 07101
 Tel: (973) 648-2052
 Kashif.Chand@law.njoag.gov
 Thomas.Huynh@law.njoag.gov
 Verna.Pradaxay@law.njoag.gov
 Mandy.Wang@law.njoag.gov

1
2 *Attorneys for Plaintiffs New Jersey Attorney General*
3 *and the New Jersey Division of Consumer Affairs*
4 *Matthew J. Platkin, Attorney General for the State of*
5 *New Jersey, and Cari Fais, Director of the New Jersey*
6 *Division of Consumer Affairs*

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1 By: /s/ Ashley M. Simonsen

2 **COVINGTON & BURLING LLP**

3 Ashley M. Simonsen, SBN 275203
4 COVINGTON & BURLING LLP
5 1999 Avenue of the Stars
6 Los Angeles, CA 90067
7 Telephone: (424) 332-4800
Facsimile: + 1 (424) 332-4749
Email: asimonsen@cov.com

8 Phyllis A. Jones, *pro hac vice*
9 Paul W. Schmidt, *pro hac vice*
COVINGTON & BURLING LLP
One City Center
10 850 Tenth Street, NW
Washington, DC 20001-4956
11 Telephone: + 1 (202) 662-6000
Facsimile: + 1 (202) 662-6291
Email: pajones@cov.com

12 *Attorney for Defendants Meta Platforms, Inc.,
Instagram, LLC; Meta Payments, Inc.; and Meta
Platforms Technologies, LLC*

13 **SIGNATURE CERTIFICATION**

14 Under Civ. L.R. 5-1(h)(3), I, Megan O'Neill, hereby attest that all signatories listed, and on
15 whose behalf the filing is submitted, concur in this filing's content and have authorized this filing.

16 DATED: July 24, 2025

17 /s/ Megan O'Neill

1 PURSUANT TO STIPULATION, IT IS SO ORDERED.
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DATED: July 28, 2025


YVONNE GONZALEZ ROGERS
UNITED STATES DISTRICT JUDGE